

EXHIBIT D

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COPY

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)
Plaintiff,)
JOHN BALDWIN, LEONARD BELL,)
JOHANNES KAINDOH AND WAYNE)
HENDERSON, GODWIN ENAGBARE,)
And JOE L. WILLIS)
Intervenor-Plaintiffs)
-against-)
WASHINGTON GROUP INTERNATIONAL,)
INC., RON BENNETT, MICHAEL FOGARTY,)
and DENNIS WOODRUFF,)
Defendants)

Civil Action No. 04-12097-GAO

NOTICE OF TAKING DEPOSITION OF STEPHEN HANKS

TO:

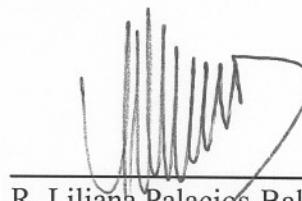
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PLEASE TAKE NOTICE that at 10:00 AM on December 22, 2006 at the Boston Area Office of the Equal Employment Opportunity Commission, JFK Federal Building, Room 475, Boston, MA, 02203-0506, (617) 565-3200, the Plaintiff will take the deposition upon oral examination of Stephen Hanks pursuant to the Federal Rules of Civil Procedure, before a court reporter, or other competent authority authorized to administer oaths. You are invited to attend and cross examine.

FOR THE PLAINTIFF,
EEOC



R. Liliana Palacios-Baldwin, MA BBO #640786
Senior Trial Attorney
EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
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Room 475
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